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>

To: <AirportEIR@longbeach.gov>  
cc:  
Subject: eir comments

01/30/2006 02:12 PM  
Please respond to  
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HELEN MANNING-BROWN  
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(562/424-3417)

January 30, 2006

Angela Reynolds  
Environmental Officer  
City of Long Beach Planning and Building Department  
333 W. Ocean Boulevard  
Long Beach, CA 90802.

RE: Long Beach AIRPORT TERMINAL Area Improvement Project  
Draft Environmental Report No. 37-03  
SCH no. 200309112

Dear Ms. Reynolds:

The attached document contains comments to the Draft Environmental Impact Report for the Long Beach Airport Area Terminal Improvement Project.

I am against the Draft EIR's conclusion that the proposed project of a 103,000 square foot Terminal Building "is the environmentally superior alternative.". The Draft EIR fails to discuss or evaluate any LEED components, which are supposed to be a guiding principal for this project. It is very unlikely that after applying the USGBC LEED criteria and principals for sustainable building, that the largest building size would be an environmentally superior alternative.

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Noise evaluations must include ALL the airport noise, noise that the surrounding community is exposed to, must be disclosed. This includes all the noise from life-flight, military and any other aviation noise that may be disregarded in the budgets for the Noise Ordinance. Policy makers and the public must have a comprehensive data of all the noise exposure. The noise contours must show all the present and expected noise impacts.

2

The Draft EIR must include air quality data of actual air sampling taken at, near and around the airport property. We who live near the airport know that when a jet runs up it engines at take off, jet exhaust levels are very high and are blown into our neighborhoods. Because residential neighborhoods and schools surround Long Beach Airport, it is imperative that this EIR fully and accurately disclose the health impacts associated with aviation and ground support emission. Aviation fuel today, particularly used by general aviation aircraft, still contains lead-based additives. The public must have accurate data that deals with airport specific emission in the community. An air-sampling site upwind of the airport is inadequate. The cumulative negative impact associated with the ports pollution and the

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710 corridor for the movement of goods, must be considered so the public knows the health risk.

} 3 cont.

Sincerely,

Helen Manning-Brown

Instead of just overbuilding a parking structure and blocking the view of the historic terminal, the EIR should evaluate alternatives to the project that could be significantly reduce the environmental impact, such as incentives for vanpool programs for the majority of passengers who happen to live in Orange County. Carpool and Vanpool programs are a known method of reducing emissions and numbers of trips. A massive parking structure to accommodate each and every passenger driving single occupancy vehicles is not the environmentally superior alternative.

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VOLUME I, Page 2-5

Airport Advisory Committee

The second half of this paragraph should be titled Commuter Slots. It is misleading to have this information buried under a topic Airport Advisory Committee, because it presents key assumptions about the commuter slots, which are inseparable from the arguments for terminal sizing. There is a high probability that average reader, members of the public, would miss this information because of its misleading location under another topic.

The last sentence of paragraph titled 'Airport Advisory Commission' states, "All 25 commuter flights are expected to be in regular operation between December 2005 and Spring 2006" is now inaccurate information an must be updated. Furthermore, many members of the community are convinced that the named airline. "Smooth Flight Holdings" was created for the sole function of slot allocation so that Jetblue and Airport Management could a build a case for the largest terminal at Long Beach Airport. Smooth Flight holdings founder, Alec Wilcox a former employee of Jetblue at Long Beach Airport, created his Airline on paper in 30 days for the sole purpose of having LBG slots allocated. He never listed assets, never had a plane, never had an employee, his corporate address is a P.O. Box in Henderson, NV. Smooth Flight Holdings never had routes for commuter flights, not did it have the capital required to start an airline, buy or lease planes, market an airline, pay employees, purchase fuel and insure this kind of business. His suggestion that he was going to "raise the assets" was a highly improbably. Many in the community are convinced Airport Management made no effort whatsoever to qualify the airline as legitimate before it announced and assigned the slots and allowed Mr. Wilcox to make it seem like he was going to have twenty-one 90-passenger flights daily flying at full passenger loads. This propaganda, claiming that there is airline, when said airline is nothing more than a corporation on paper, is inconsistent with the EIR objectives of "full-disclosure document" to "inform agency decision makers and the general public." (page 1-1 General Introduction)

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Mr. Wilcox, upon the assignment of slots by Airport Management, publicly stated that his planes were to bring in 90-passenger planes, which allowed Airport Management to inflate expected passenger loads of up to an additional 821,000 annual passengers. The arguments for the largest terminal possible and expansive parking structure are invalid and the community deserves transparency. Previous assumptions for commuter slots are entirely unfounded.

Furthermore, the City Council instructed Airport Management NOT to market the available commuter slots. But with the appearance of, Smooth Flight

Holdings original application, Airport Management immediately notified all the airlines, an in effect marketed all slot availability, before notifying Council that the application had been filed. The community believes this strategy was timed to coincide with the Airport Management wanting an argument to build the largest terminal possible.

4 cont.

VOLUME I, Page 2-11  
Paragraph 2 (LEED)

The discussion of achieving LEED certification is inadequate and fails to capture or adequately coordinate the environmentally favorable strategies required by USGBC to achieve LEED status. For full public disclosure, this discussion should include more substantive information in order that both policy makers and the public can understand the benefits to the environment proposed by LEED.

Failing to incorporate LEED strategies at this stage, allows the authors of the DEIR to conclude that the largest building option is the "Environmentally Superior Alternative." To delay applying any LEED standards at this stage of the project evaluation is not an "objective" evaluation, but rather appears to have embraced the bias of Airport Management, the entity that is paying for the EIR. Airport Management is on the public record as wanting the largest terminal building possible.

With the City of Long Beach a member of the U. S. Green Building Council (USGBC) and publicly commitment to LEED building, it is impetrative that this project not be accused of "green washing" in the EIR's project evaluation stage , but rather the City must acknowledge the principals and standards that are consistent with USGBC's sustainable building practices. Doing so would reveal the flawed conclusion that the largest building is the "Environmental Superior Alternative"

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For example, LEED principals are significantly more likely to point to a smaller building square footage that requires less energy to air condition, less energy to heat, less energy to light, less materials used to build, less fossil fuel to transport building materials, less chemicals used for years of routine maintenance, and no impact on previously undeveloped open space (Parcel O).

LEED strategies apply objective and proven methodologies, and will look beyond the DEIR simplistic conclusion that the largest terminal size is superior because a parking structure would result in fewer round trips and jets would not idle. LEED principals are designed to incorporate enducements for carpools, vanpools, shared rides, public transportation to significantly reduce the environmental impact of building users transportation to the building. Smaller buildings require fewer resources to build and fewer resources to maintain. The airlines can be legally induced to level schedules to reduce the likelihood of jet engine idling that occurs when too many flights are scheduled in narrow time slots. LEED strategies must be evaluated as they have proven to be the most economical and environmentally superior protocols than "bigger is better."

VOLUME I, Page 2-11  
Paragraph 4

The written description, "The new construction would generally be set back from the existing Airport Terminal Building so as not to appear an "add on" to the exiting airport terminal structure" is inconsistent with the

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illustrations provided which do create an appearance that the new construction has been added on to the existing terminal.

} 7 cont.

VOLUME I, Page 2-12  
Concession Area

The concession area assumption "to serve the anticipated number of passengers" is an inadequate explanation. In August 2005, there was a questionable allocation of commuter slots to faux airline. The airline was promising an exaggerated 850,000 annual passengers per year. That airline had no assets and had only been in business for 30 days when it was assigned slots. That airline has the slot allocation rescinded and the "anticipated number of passengers" must be adjusted. Another factor requiring analysis is that commuter travelers on 30-minute flights are unlikely to utilize the concession services for meals. There is a high probability that commuter passengers have a lower demand for full meals.

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This EIR needs to adequately identify and evaluate alternatives such as if scheduling modifications will level passenger occupancy in holdrooms, and alleviate peak demand at concession areas. Current flight scheduling appears to create a peak periods which distort the evaluation of space requirements for concession area and space will be underutilized for many hours of the day, and thus is overbuilt for the annual passengers loads..

VOLUME I, Page 2-12 through 2-13

Covered open areas in addition to the building area, covered by full roofing should be calculated into the square footage of the structure. These appear to be structural parts of the building, not open areas, provided for by the City for airlines and TSA. Providing the roof and foundation structure, while considered open-air construction is still part of the construction and building design. This design feature appears to be a loop-hole, because as part of the structural roof, it can be simply enclosed by walls in the future to add additional square footage to the terminal size.

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VOLUME I, Page 2-12  
Baggage Security Screening

The statement "TSA has indicated that the open-air situation is not sufficient because of the sensitivity of the equipment being used. The Proposed Project would provide a 7,000-square foot structure for security screening of baggage. The structure would house the explosive detection equipment and would include in-line baggage conveyors" This statement is highly misleading and fails to adequately explain that TSA is operating with adequate facilities within the current conditions. If current conditions are insufficient, how can TSA function and allow 3,000,00 passenger per years travel through Long Beach Airport without adequate screening?

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There have been numerous requests by community leaders for TSA to supply actual documented requirements, which apply to all airports nationwide. To date no one has been able to provide the City with TSA mandated requirements. TSA is not requiring high speed, high capacity, in-line explosive detection equipment and that fact should be stated for the public record. If the no-build option is selected, TSA will continue to screen

baggage with the same degree of assurance for public safety.

} 10 cont.

VOLUME I, Page 3.3-5,  
Historical Landmark Designation

Criterion B The statement "The airport has been a significant part of the City's economy since its founding in 1924, and an important factor in Long Beach's economic growth" needs to be modified to historical criteria only to conform to the subheading under which it is placed. Economic criteria are a separate and highly controversial topic and not part of the EIR review. In 2004, Dr. Magaddino was paid \$30,000 to prepare an airport economic impact report. This study was conducted with complete disregard for public input and at no time was the negative economic impact evaluated in comparison the neighborhoods that surround LBG. No member of the public were allowed to provide input on that research design, yet members of the aviation community, active advocates of airport growth, were selected by the Airport management to participate on the steering committee. The final report was highly questionable and eventually never made it past the Transportation and Infrastructure Committee. Additionally, when it was presented to the Economic Development Commissioner, the public was not allowed to speak - a Brown Act Violation.

Furthermore, the economic contribution from the manufacturing sector must be clearly distinguished from the Airport Terminal Improvement Project. It is the manufacturing jobs that are the higher paying jobs, and these manufacturing jobs will not be impacted by the terminal improvement project. No independently validated research has ever pointed to a fact that the terminal is an important factor in Long Beach's economic growth. No independently validated research has shown that travelers spend enough money or time in Long Beach to compensate for the negative impacts of having a commercial airlines flying directly over residential neighborhoods at all times of the day and night, often outside the hours allowable by the ordinance.

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Economic Growth should NOT be criterion of the Airport Terminal Improvement Project. The project will not result in increased passenger loads or significant consumer spending at the terminal. Reduced spending at local food establishments near the terminal will largely offset any new tax revenue as a result of new concessions. If passengers are able to buy a sandwich at the terminal, they won't stop at a local establishment before arriving at the terminal. The public and residents surrounding the airport has been promised that terminal improvements will not generate more passengers, or more flights. Therefore, no increase in the amount of passengers will provide a new source for economic growth. Additionally, the airport properties have been identified as economic enterprise zones and are already enjoying tax advantages that serve to reduce realized revenue to the State and the City.

VOLUME I, Page 3.312  
Paragraph 1

Per Secretary Standard #10 "...and new construction would be ..compatible in size, massing, scale and style" is Not in conformance. The original terminal structure of the Historic Long Beach Terminal is less than 30,000 square feet. The proposed new construction in excess of an additional 70,000 square feet plus unspecified covered areas with a full roof and lighting.

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This brings the proposed new structure to an increase of about 200% for massing and scale. Furthermore, the proposed new parking structure adds adjacent structure massing that will all serve to significantly dwarf the original terminal which the community is striving to preserve in character and aesthetic appeal.

12 cont.

VOLUME I, Page 3.4-7  
Regulated Materials, Aerially-Deposited Lead

The discussion on aerially deposited lead is inadequate. The paragraph fails to mention that lead continues to be an additive to in aviation fuel today and its presence in the near-surface soil may be more widespread than the case outlined by limiting the discussion to automobile fuels before 1990 and limiting the exhaust to adjacent roadways. Full public disclosure requires an evaluation of the hazards of aerially deposited lead that may still be going on today. The likelihood of significantly greater amounts of aerially deposited lead from aviation fuel deposited directly on airport property is high. Because of the lead based additives in aviation fuels into this decade, there needs to be core testing of the soil in advance of the project. Remediation costs could have an significant impact on the project costs and the City and the public need to know what to anticipate. Soil movement when grading for new construction and the high probability of lead within the windblown dust could have significant health impact to neighborhoods surrounding the airport.

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VOLUME I, Page 3.6-1  
Noise

The discussion, while complex, fails to address actual noise impacts in the environment. The community has only recently learned that noise calculations and analysis required by the noise ordinance, entirely disregard the high noise levels created when planes run up their engines at take off, and the noise levels created by reverse thrusters when a plane lands. While this newly uncovered practice of disregarding noise when a plane's wheels are on the ground, this noise is very real and the levels must be revealed to the community. Presenting data of all actual noise levels is the only way the community can adequately address the noise impacts. The noise contours must be reconfigured to publicly disclose actual noise form all planes, even the noise created at take-off and landing. It is also imperative that the noise, disregarded in the monthly noise calculation, such as military and life flights, be publicly disclosed. Accurate and comprehensive data of all actual noise levels is the only way the public can evaluate the full and complete extent the adverse impacts: loss of sleep, annoyance levels, disruption to concentration, disruption to work activities, disruption to classroom activities. The actual noise levels also have impacts the valuation of properties and the public should have an understating of how noise contributes to neighborhood blight.

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VOLUME I, Page 3.7-5, Project Related Impacts

The statement " ..the circulation improvements associated with the Proposed Project would reduce the possibility of safety hazards related to overcrowding." is an inadequate evaluation. The discussion must include the increased difficulty associated with providing more security for more

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square footage. The alternatives to the "possibility of overcrowding," such as smoothing out the schedules so occupancy is leveled out over the day, need to be evaluated. The EIR must consider that reducing the number of persons in the terminal at any one time, with a less square footage to secure, offers greater safety than adding more space and more people at a single time.

Usage fees can be tiered to encourage the airlines to smooth flights over the day and eliminate the safety hazards related to overcrowding. In addition, the EIR should consider that the larger project incrementally increases the attractiveness of the terminal as a terrorist target.

15 cont.

VOLUME I, Page 3.7-13  
Project Related Impacts

The discussion fails to adequately cover the alternative that adjusting and leveling flight schedules can alleviate "the possibility of overcrowding." The discussion also fails to fully disclose the role and authority of TSA has to dictate terminal facilities sizing at any airport. It is to imperative publicly disclose, so the public is able to differentiate TSA desire versus TSA mandates. The statement that "TSA staff are concerned that there could be [safety impacts]" is misleading to members of the public. Using TSA staff's "desires" without clearly identifying TSA mandates is an inadequate analysis. No evaluation has been made to quantify or qualify if TSA staff concerns are valid. If TSA is currently handling 3,000,000 passengers per year without incident, what is their argument for new facilities other than the want new facilities? In October, during a District 4 tour, hosted by our Councilmember, tour, we witnessed 8-12 TSA agents at their security screening post, standing around, doing nothing. They had no passenger to screen and the tour was scheduled during a peak period. This is an unacceptable waste of public resources. A failure to address flight smoothing and schedules, as opposed to just building more screening facilities is unacceptable.

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VOLUME I, Page 3.7-13  
Additional Effect Related to Optimized Flights

The discussion acknowledges that TSA is required and will meet the minimum safety screening requirements but without improvements to the facilities, "delays would be expected." This is an absolutely unproven statement. Schedules can be adjusted to accommodate passenger capacity and this needs to be evaluated in the discussion. While the airport cannot mandate airline scheduling, it is reasonable and legal to for the airport to charge usage fees that discourage airlines from scheduling flights on top of one another.

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VOLUME I, Page 3.7-13  
Impact 3.7-1

The impact as stated does not adequately answer the problem. Holdroom capacity is a factor of flight scheduling and it is perfectly reasonable to adjust schedules to alleviate crowding by leveling out the flights across the hours allowable. At this time, Jetblue chooses to book flights that have a significant impact on congestion and crowding is a function of scheduling. Many members of the public believe that the currently scheduling is intended to make the airport look inadequate. This

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intentional "crowding" enables the tenant to make a case for a larger building. Many in the community think a larger building will create excess capacity that puts the noise ordinance at risk for being challenged in court. The community does not want more flights. This airport is surrounded on all sides by residential neighborhoods.

18 cont.

VOLUME I, Page 3.8-1 through Page 3.8-11  
Transportation and Circulation

The discussion fails to consider any utilization of High Occupancy Vehicles (carpools and van pools) to alleviate traffic congestion. The construction related impacts assume onsite parking for all construction workers, which is unnecessary. Providing parking for each and every construction worker is unnecessary when vanpools are commonly used in construction projects across the country.

The discussion fails to consider incentives use for vanpools for passenger traffic. Given that LEED certification is a stated goal of this project, carpooling, vanpooling and public transportation should be considered as attribute that can significantly reduce parking and roadway demand. A shared van ride, with four passengers from Orange County require 0 parking spaces, while each passenger driving his own car requires 4 parking spaces. It is an environmentally superior option for passengers to use van pools than for people to drive their single occupancy vehicles.

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VOLUME I, Notice of Preparation, Page 7  
Summary of the Principal terms of the Existing Settlement Stipulation

Item 7. Provides for the General Aviation Noise Committee formed to monitor and manage the general aviation noise budget. Presently this committee has renamed itself to Noise Abatement Committee and has taken upon itself to redefine its scope beyond General Aviation. It is actively monitoring and managing Commercial and Industrial Carriers. Its membership now includes Commercial and Industrial Carriers. These meetings are not open to the public. The community is currently seeking to correct this misinterpretation of this committee as provided for by the Noise Ordinance.

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VOLUME I, year 2004 CNEL Contours,  
Exhibits 3.6-9, 3.6-10a, 3.6-10b, 3.6-11a, and 3.6-11b,

All the exhibits illustrating noise contours are inadequate. These exhibits fail to show actual noise created at the airport, because they do not include high noise levels when jets are running up their engines at take-off and the high noise levels when the reverse thrusters are turned on during landing. The environmental impact report must include and report actual noise in order for the community to have an accurate assessment of the noise impacts reaching into surrounding neighborhoods. When jets wheels are on the ground, if they create high noise levels, this data cannot be excluded. Additionally, all noise data flights from all flights must be included. It is misleading to the community to have exclusions of data, though military and life flight are not calculated into the ordinance. The cumulative impact all airport noise must be disclosed for adequate and truthful noise assessment.

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VOLUME I, Generalized Area of Terminal Improvements, Exhibit 2-4

This image is misleading to the public. The actual land use being discussed includes Parcel "O" but Parcel "O" is not depicted in this exhibit. The entire depiction of land use must be shown clearly so as not to mislead the public about the magnitude of the project proposal.

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VOLUME I, Concept, Exhibit 2-5

This image is misleading to the public. The plan view shows 9 whole plane bodies and 3 partial plane bodies for a depiction totaling 11 ½ planes. The illustration must show the 14 plane parking positions which are currently being discussed in the proposal. Not to show them is highly misleading to members of the community. The public must see the correct amount of jets, which translates to the parking position being considered.

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VOLUME I, Perspective of Conceptual View from Land Side, Exhibit 3.1-1

This image is misleading to the public. The perspective view is not from the land side as it states, but rather it is an aerial perspective showing the terminal as if the viewer is in a helicopter. It fails to accurately depict the proposed project as if the viewer were on the land side approaching the airport terminal. It fails to depict that the proposed new parking structure will completely obscure the view of the historic terminal. A view of the terminal, when arriving at the airport, is inseparable from

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The illustration must show the 14-plane parking positions, which are currently being discussed in the proposal. Not to show them is highly misleading to members of the community. The public must see the correct amount of jets, which translates to the parking position being considered.

VOLUME II, Section 3 Emission Estimate Page 3-1

It appears the overwhelming public demand was to have actual air sampling conducted at the airport, in the neighborhoods and schools surrounding the airport was ignored. Instead, this DEIR took the advice from the SCAQMD and CARN and limited air sampling to the existing station upwind of the airport. That location cannot possibly collect and measure the particulate matter, including the high-risk peak exposure of jet emissions at take off and landing. It cannot collect any possible aircraft emissions still using lead-based additives in aviation fuels. Air sampling must be completed to conduct the Environmental review necessary to evaluate health impact of this project. Long Beach is one of the busiest general aviation airports in the nation and therefore, is likely to have the highest emissions in neighborhoods of lead-based aviation fuel. The current air sampling location does not collect this emission source nor can it monitor peak emission condition that may occur at certain high activity times.

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EVEN if it takes more time, the City must understand, recognize and address the negative human health impact to Long Beach residents of actual air emissions not simply estimates.

Combined with the overwhelming amounts of air pollution created by the Port

of Long Beach, the Port of Los Angeles, the movement of goods from both Ports, and commuter traffic on the 405 and 710 freeways, the City must look more carefully at the cumulative negative impact of airport emissions on human health.

} 25 cont.

**COMMENTS 290 HELEN MANNING-BROWN**  
**Dated: January 30, 2006**

**Response 1**

There is a commitment to construct the new facilities to meet high standards for energy efficiency and environmental design. The intention is to construct the facilities consistent with the LEED standards. LEED, which stands for Leadership in Energy and Environmental Design is 'based on well-founded scientific standards, LEED standards emphasizes state of the art strategies for sustainable site development, water savings, energy efficiency, materials selection and indoor environmental quality. LEED standards recognizes achievements and promotes expertise in green building through a comprehensive system offering project certification, professional accreditation, training and practical resources.' (U.S. Green Building Council, <http://www.usgbc.org>). This would be implemented through a variety of design features. Precise methods for accomplishing the LEED standards would be determined through project design.

It is recognized that construction of facilities in excess of what is required to serve the demand would not be efficient; however, it is also necessary to provide sufficient facilities to serve the demand. Construction of terminal improvements that would not serve the demand and necessitate other improvements or use of temporary modular buildings, similar to existing conditions, would not be environmentally superior. As indicated in the Draft EIR (page 1-25),

...based on the *Facility Requirements Analysis, Long Beach Municipal Airport*<sup>75</sup> study which was prepared during the scoping process, the recommended sizes of the facilities to best meet the needs for the passengers, visitors, and tenants actually exceeded the square footage allocation of even the Proposed Project.

Refer to Topical Response 3.1.4 regarding the environmentally superior alternative.

**Response 2**

The noise contours for the year 2004 presented in the Draft EIR included the military flights logged at the airport. These same assumptions were used for the Optimized Flights Scenario. Table 3-1 in Appendix F of the Draft EIR lists the military flights used in the study. On the average day, there are 4.4 military and government operations. It should be noted that military aircraft are exempt from the Airport Noise Compatibility Ordinance and the City of Long Beach cannot regulate military aircraft in any way.

**Response 3**

Please see Topical Response 3.1.5 regarding the methodology for the air quality and human health risk assessment.

**Response 4**

Your comment is noted. Topical Response 3.1.8 provides discussion of the potential visual effects of the parking structure. The visual corridor that is protected by the setback provided for the parking structure.

The commenter suggests that public transit service should be incorporated as an access alternative to and from the Airport in the future development plan. It should be noted that the

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<sup>75</sup> HNTB 2004.

Airport currently provides Long Beach Transit (LBT) access to the Airport and intends to include an accessible, convenient LBT stop in any future improvements. The Airport is planning a “ground transportation plaza” as well as other changes in traffic circulation to facilitate multiple ground transportation services. The City has committed to work with LBT to ensure that transit design guidelines are considered in the design of these areas and in the location of LBT bus stop(s).

The number of parking spaces does not provide for a parking space for each passenger, as suggested by the comment. The parking demand was calculated from a professional parking study entitled “Long Beach Airport Parking Adequacy Analysis”, which was conducted for the City in 2001. The study showed a need for 2.75 parking spaces for each 1,000 annual enplanements. If sufficient parking were not provided, there would be an increase in the number of passenger drop-off and pick-up trips because some of the passengers would have no other option but to be dropped off, increasing the overall amount of traffic at the airport. Additionally, there would be spill over parking into the adjacent neighborhoods. It should also be noted, the parking structures at the Airport will serve not just passengers, but also employees and tenant parking.

## Response 5

The fact that the EIR was addressing the impacts associated with the commuter flights was not “buried under a topic Airport Advisory Committee” as the commenter indicates. This was identified as a key assumption of the document. It is discussed in multiple locations throughout the EIR, including at a minimum seven times prior to the referenced discussion under the Airport Advisory Committee.

In Section 1.0, Executive Summary there are the following references to commuter flights:

- Section 1.4, Project Description, “The terminal area improvements are being designed to accommodate the 41 airline flights and 25 commuter flights, passengers associated with those flights, and security requirements imposed by TSA. This number of flights is already permitted by Chapter 16.43 of the Municipal Code.”
- Section 1.4, Project Description, “Though not a component of the Proposed Project, the EIR also addresses the impacts associated with up to 52 commercial flights and full utilization of 25 commuter flights. At the time the baseline for this EIR was established, there were no commuter flights operating out of the Airport. Subsequently, America West has initiated daily commuter flights and Delta and Smooth Flight Holdings have been conditionally granted commuter flights. All 25 commuter flights are expected to be in regular service between December 2005 and Spring 2006.” This is the same discussion referenced as being “buried” in Section 2.4.2.
- Section 1.5, Project Objectives, “The key project objective is to provide Airport facilities to accommodate the minimum permitted number of flights at the Airport (i.e., 41 commercial flights and 25 commuter flights) and the associated number of passengers served on those flights, in full compliance with all applicable fire, building, safety codes and other applicable standards.”
- Section 1.6, Areas of Controversy and Issues to be Resolved, “As discussed in Section 3.6, Noise, the Airport Noise Compatibility Ordinance provides noise thresholds or “noise budgets” for various types of aircraft. While the Airport Noise Compatibility Ordinance provides for a minimum of 25 commuter flights, historically there have been very few commuter flight operations. Some members of the community have expressed a concern

that by providing additional facilities that would serve commuter aircraft, the project would encourage commuter operations at the Airport, resulting in greater impacts than currently are experienced. Given that commuter aircraft could operate out of the existing facilities, market factors rather than provision of additional aircraft gates designed for commuter aircraft would have greater influence on whether commuter airlines operate out of the Airport. ... In recognition of the concern associated with any increase in flight levels over current levels, the EIR has addressed the potential impacts associated with the full utilization of 25 commuter flights, even though these flights have already been provided for as part of the Airport Noise Compatibility Ordinance and were addressed in the 1995 environmental documentation for the Ordinance."

- Section 1.6, Areas of Controversy and Issues to be Resolved, "In response to this concern, a Health Risk Assessment (HRA) has been prepared for the Proposed Project. The HRA addresses not only the terminal area improvements, but also the possible addition of the 11 commercial carrier flights and the full utilization of the 25 commuter flights."
- Section 1.12, Alternatives, the following is provided as part of the description for each of the alternatives evaluated, "Other aspects of the project, such as the number of gates, aircraft parking and vehicular parking would be the same for Alternative A as for the Proposed Project. As with all the alternatives, the EIR evaluates 52 commercial flights and 25 commuter flights for Alternative A. These assumptions are constant with all the alternatives because the number of flights is not causally related to the project proposed facilities improvements, and any impacts would be applicable to all alternatives because they could occur without any project-proposed improvements."

In Section 2.0, Project Description, there are the following references to commuter flights prior to the Section referenced by the commenter:

- Section 2.2.2, Regulatory Setting, in the summary of the principle terms of the existing settlement agreement, "Provide flight activity limits at the Airport of a minimum of 41 daily airline (commercial) flights and 25 daily commuter flights, assumed to be all Stage 3 aircraft;"

The discussion of commuter flights was also included two additional times in Section 2.0, Project Description, subsequent to the section referenced by the commenter. This included the actual project description (Section 2.5), the discussion of operational considerations (Section 2.6).

The opinion of members of the community as to the viability of the Smooth Flight Holdings is irrelevant to the analysis in the EIR. The City Council directed that the EIR address the potential impacts associated with the commuter flights prior to the application of Smooth Flight Holdings. At the time the NOP was issued, there were no commuter flights. This point too was reflected in the EIR. The fact is that the provision of the commuter flights is outlined in the Airport Noise Compatibility Ordinance and can occur with or without the Proposed Project.

## Response 6

As indicated on page 2-11 of the Draft EIR, LEED, which stands for Leadership in Energy and Environmental Design, would be implemented through a variety of design features. Precise methods for accomplishing the LEED standards would be determined through project design. Until a design of the terminal facilities is established it is not possible to state with certainty which measures would be implemented. The web site for the U.S. Green Building Council,

(<http://www.usgbc.org>), which was provided in the EIR, is a good resource that identifies the type of measures that can be implemented to obtain the LEED certification. The web site outlines the rating and certification processes. Certification is done at the design or construction stage.

While LEED does not advocate overbuilding, nor does it require that a facility be designed to inadequately accommodate the use being proposed, which for the Proposed Project is provide Airport terminal facilities to adequately accommodate the minimum number of flights provided for in the Airport Noise Compatibility Ordinance, as well as the number of passengers served by those flights. The project design must provide for the following be able to meet all applicable, federal, State and local standards including the City's fire, building, and safety codes. An airport has special space requires to accommodate the special needs of travelers. The size of the facility was based on an evaluation of the needs of the travelers, as well as applicable codes. The size terminal building for all of the alternatives is substantially less than what was recommended by the study conducted as part of scoping.

It should be noted, that the commenter incorrectly infers that the smaller terminal building would reduce the impact on previously undeveloped open space (Parcel O). The development of Parcel O is associated with the displacement of general aviation aircraft to accommodate the aircraft parking spaces. This parcel has been designated for development for general aviation tie downs and hangars.

As indicated in response to Comment 4, above, the Proposed Project does provide for transit and other ride-sharing methods, such as shuttle buses.

#### **Response 7**

The new facilities would be connected to the existing Terminal Building, per TSA requirements. The reference to the new construction being setback from the existing building was intended to communicate that the existing Terminal Building would not be surrounded on all sides by the proposed addition. The existing building would still be distinct from the proposed new space. The exhibits showing the relationship of the existing Terminal Building to the proposed additions was provided to more fully communicate what is being proposed.

#### **Response 8**

As indicated in response to Comment 5, above, the City Council directed that the EIR address the potential impacts associated with the commuter flights provided for in the Airport Noise Compatibility Ordinance, which would include accommodating the passengers associated with those flights. There was nothing in the Project Description to indicate that the size of the concession facilities assumed that commuter passengers would be interested in full meals. When sizing the concession facilities, it must be recognized that all passengers are required to be at the Airport substantially before their flight to allow sufficient time for security screening and that most commercial flights provided limited food service.

The distribution of flights throughout the day is market driven. Except for provisions of the curfew, the City cannot dictate the time of day when the airlines must schedule their operations. The City would not be able to have the airlines schedule flights to alleviate peak demand in concession areas.

## Response 9

The concept design provides four areas that would be covered, but open air (not enclosed). These are the baggage make-up areas, the ticketing and queuing areas, an area for “meeters and greeters,” and the baggage claim area. A covered area for baggage make-up area (where the airlines receive screened bags from TSA, which are then sorted and loaded onto baggage carts) is needed to protect the screened baggage from the elements. Currently, this area is provided for in one of the tents used by TSA. The intention of the project is to eliminate the need for tent facilities at the Airport. Leaving baggage out in inclement weather is not a reasonable alternative. The ticketing and queuing area, as well as the area for “meeters and greeters,” is intended to eliminate congestion in front of the terminal building and provide for protected spaces for these uses. Having a designated area for “meeters and greeters” enhances safety. This space is most effective outside of the terminal building. The final area, the baggage claim area, is currently outside the existing terminal building and was designated as such by the City Council when defining the scope of the Proposed Project and alternatives.

## Response 10

TSA has indicated that the current open-air baggage security screening area is not sufficient because of the sensitivity of the equipment being used. TSA has further indicated its requirement for a fully enclosed, air-conditioned building for checked baggage screening. These requests are memorialized in a document entitled, *Transportation Security Administration Space Requirements at Long Beach Airport*. The in-line baggage conveyors that are currently being used are placed within a tent with the equipment placed on pallets to keep them dry. The Aviation and Transportation Security Act establishes TSA's authority for passenger and baggage screening.

## Response 11

As footnoted in the Draft EIR, the referenced text was taken verbatim from the March 22, 1990 Memorandum used when the Terminal Building was nominated as a historical landmark. The Memorandum was documenting the contribution of McDonnell Douglas and the Douglas Aircraft Company's contribution to the development of the economy of Long Beach since its founding in 1924. This section has nothing to do with criterion for selecting a terminal improvement. The criterion that are cited are the criterion that the Long Beach Cultural Heritage Commission considered when evaluating the terminal building for landmark status. Economic factors are not used as a consideration in evaluating the Proposed Project or the alternatives.

The appropriateness of the economic report prepared in 2004 is not relevant to this EIR because it was not used as the basis for determining the scope of the project, in the evaluation of the project, or as part of any recommendations associated with this EIR.

## Response 12

Your opinions are noted and have been forwarded to the decision-makers as part of the Final EIR. The Cultural Heritage Commission would determine the conformance of the design with the Secretary of Interior's standards at the time of issuance of the Certificate of Appropriateness.

## Response 13

Page 3.4-7 of the Draft EIR does acknowledge the potential contribution of aerially deposited lead associated with use of jet fuel and diesel fuel. It states that elevated concentrations of lead

are likely to be found in near-surface soil at the Airport, especially in those areas where unpaved soil and medians will be disturbed as a result of project grading/construction. As such, the standard condition requiring testing of the soil for aerially deposited lead has been applied. Should quantities of aerially deposited lead exceed acceptable thresholds, the City shall develop a remediation program to dispose of soil material consistent with state and federal regulations. It should be noted that testing done in March 2006 for a pavement rehabilitation project for Taxiways L and C did not identify lead deposits in excess of standards. The Airport took 3 samples at 13 locations for a total of 39 tests samples. The Total Lead ranged from 2.3 to 29.0 mg/kg. The California Modified Preliminary Remediation Goal is 150 mg/kg and the Caltrans' variance with the Department of Toxic Substance Control does not require remediation if Total Lead is less than 350 mg/kg. Therefore, so, at 2.3 to 29.0 mg/kg, no remediation for aerially deposited lead is required.

Additionally, it should be noted that the air quality analysis evaluated the potential impact associated with lead in air emissions as a criteria pollutant (see Section 3.2 of the Draft EIR). The lead specification for 100LL (0.56 g/gal) was used to estimate lead emissions from piston aircraft.

#### **Response 14**

The noise contours do take into account landings and take offs from both directions, as well as the military aircraft utilizing the Airport. The methodology for developing the noise contours is described on page 3.6-11 of the Draft EIR. Aircraft flight patterns, number of operations, and types of aircraft are used to develop the noise contours.

#### **Response 15**

As discussed on page 3.7-6, staffing levels for airport security, police, fire, paramedic, and TSA personnel are tied to the number of passengers and flights served by the Airport. Because the Proposed Project would not alter the number of passengers or flights at the Airport, there would be no impact on staffing levels. As indicated above, the distribution of flights throughout the day is market driven and is not controlled by the City.

#### **Response 16**

The EIR does not state that the TSA mandates the improvements. The improvements are necessary to effectively meet the security requirements imposed by TSA, which includes passenger and baggage screening. Space and facilities must be provided to accommodate the employees and equipment associated with the security screening. Given the sensitivity of the equipment that is used for the screening, the current conditions are not adequate for long-term operations.

#### **Response 17**

The flight assumptions for the Optimized Flights Scenario are presented in the Draft EIR on pages 3.6-12 through 3.6-14. For purposes of analysis, it was assumed that all new flights would be distributed throughout day according to the present distribution of flights, with reduced night operations. It assumed the airlines would continue to use the current fleet mix and operate within current markets. Therefore, it is a reasonable assumption that without any improvements to the existing facilities, that there would be additional congestion with the No Project Alternative as the Airport attempts to serve the additional 850,000 annual passengers associated with the Optimized Flights without providing any physical improvements. It is not reasonable to assume that flights at the Airport would be evenly distributed throughout the day to avoid peak hour



demands on facilities. As indicated above, the distribution of flights throughout the day is market driven. The occurrences of peaks in flight activity can be found at all airports. The airlines respond to the times that passengers want to fly. Except for provisions of the curfew, the City cannot dictate the time of day when the airlines must schedule their operations.

### **Response 18**

As discussed above, the distribution of flights throughout the day is market driven. Just as freeways and roadways experience peak hour demands due to driver demand, the Airport experiences peak hour in flight demand. There is no indication that Jet Blue or any other airline has manipulated scheduling to make the Airport look inadequate. The occurrences of peaks in flight activity can be found at all airports.

### **Response 19**

A review of the trip generation rates used in the analysis demonstrates that some ride-sharing, transit use, or shuttle services are being used at the Airport. As noted in the Draft EIR on page 3.8-3, the trip generation of 1.77 daily trips per passenger expresses the trips with regards to the number of daily trips per passenger, but factors in employee trips and delivery trips as well. As indicated above, the Airport currently provides Long Beach Transit access to the Airport and intends to include an accessible, convenient LBT stop in any future improvements. The proposed improvements would provide for a “ground transportation plaza” as well as other changes in traffic circulation to facilitate multiple ground transportation services.

The construction traffic analysis provided for a worse case peak-hour traffic analysis, which assumed up to 50 peak hour trips. No specific parking assumptions were made for the construction trips. It is assumed that the construction-related parking would occur within the construction area or in a designed area on the Airport.

### **Response 20**

The City's Airport Noise Compatibility Ordinance, LBMC 16.43, Section 16.43.090 A, established and defined the role and responsibility of the General Aviation Noise Committee (GANC). The commenter is correct that several years ago the group changed their working name to the Aviation Noise Abatement Committee (ANAC). Per the Ordinance, this committee is not mandatory and the decision to organize such a committee is at the discretion of the Airport's General Aviation Owner/Operators. Their stated purpose is “to encourage voluntary noise abatement efforts.”

### **Response 21**

The noise contours do take into account landings and take offs from both directions, as well as the military aircraft utilizing the Airport. The methodology for developing the noise contours is described on page 3.6-11 of the Draft EIR. Aircraft flight patterns, number of operations, and types of aircraft are used to develop the noise contours.

### **Response 22**

Your comment is noted. Exhibit 2-4 is identified as the generalized location of the terminal improvements. Parcel O is the location for the relocation of general aviation tie-down spaces. The location of Parcel O is depicted in Exhibit 2-7. Exhibit 2-3 depicts the location of the terminal area, as well as Parcel O. This provides the reader perspective of two locations where improvements are proposed.

**Response 23**

Your comment is noted. An exhibit is provided at the end of these responses to comments that depict the maximum 14 aircraft parking spaces.

**Response 24**

Discussion of the visual aspects of the project, including a line of site drawing for the parking structure is provided in Attachment A of these responses to comments.

**Response 25**

*The Final Protocol for Conducting an Air Quality Impact Analysis and Human Health Risk Assessment for the Long Beach Airport* (Draft EIR, Appendix C, Attachment A), was reviewed and approved by the SCAQMD, the agency with expertise in this area. There is further discussion of the methodology for the air quality analysis in Topical Response 3.1.5.